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Attorneys for the Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ANDREW CLARKE and TAPAS SARKAR,
individually and on behalf of other similarly
situated persons,

Plaintiffs,

v.

J.P. MORGAN CHASE & CO.,

Defendants.

Case No. 08-cv-2400 (CM)

**MOTION TO ADMIT JAHAN C. SAGAFI
PRO HAC VICE**

FILED
U.S. DISTRICT COURT
S.D. OF N.Y.
2008 APR 23 PM 3:57

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, and based on the Declaration submitted herewith, I, Rachel Geman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

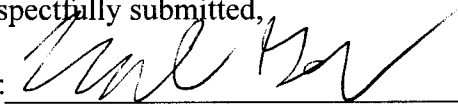
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Jahan C. Sagafi is a member in good standing of the Bar of the State of California. There is no pending disciplinary proceeding against Jahan C. Sagafi in any State or Federal Court.

Dated: April 23, 2008
New York, New York

Respectfully submitted,

By:



Rachel Geman, Bar No. RG-0998

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individually and on behalf of other similarly
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Plaintiffs,

v.

J.P. MORGAN CHASE & CO.,

Defendants.

Case No. 08-cv-2400 (CM)

**DECLARATION OF RACHEL GEMAN
IN SUPPORT OF *PRO HAC VICE*
APPLICATION OF JAHAN C. SAGAFI**

RACHEL GEMAN declares under penalty of perjury:

1. I am a member of the law firm of Lief, Cabraser, Heimann & Bernstein, LLP, counsel for Plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Jahan C. Sagafi as counsel *pro hac vice* to represent Plaintiffs in this matter.

2. I am a member in good standing of the bar of the State of New York and have been admitted to practice in the Southern District of New York since January, 1999.

3. I have known Mr. Sagafi since 1993.

4. Jahan C. Sagafi is a member of Lief, Cabraser, Heimann & Bernstein, LLP, 275 Battery Street, 30th Floor, San Francisco, California 94111-3339.

5. Mr. Sagafi is admitted to practice before the Bar of the State of California and is in good standing. The certificate of good standing with respect to Mr. Sagafi is annexed as Exhibit A.

6. Mr. Sagafi has not been subjected to discipline by any court and no disciplinary charges are currently pending against him.

7. Mr. Sagafi is fully familiar with the individual rules of this Court and the local rules of the United States District Court for the Southern District of New York.

Dated: April ²³ , 2008
New York, New York

Respectfully submitted,

By: 

Rachel Geman, Bar No. RG-0998

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BERNSTEIN, LLP

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THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

April 8, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JAHAN CRAWFORD REZA SAGAFI, #224887 was admitted to the practice of law in this state by the Supreme Court of California on June 2, 2003; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert
Custodian of Membership Records

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Case No. 08-cv-2400 (CM)

**[PROPOSED] ORDER GRANTING *PRO*
HAC VICE APPLICATION OF
JAHAN C. SAGAFI**

It is hereby ORDERED that Plaintiffs' Motion for the *Pro Hac Vice* Application of attorney Jahan C. Sagafi, counsel for Plaintiffs, is GRANTED.

So Ordered:

Dated: _____

Hon. Colleen McMahon
United States District Judge


CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this day, April 23, 2008, true and correct copies of the following:

- Motion to Admit Jahan C. Sagafi Pro Hac Vice
- Affidavit of Rachel Geman in Support of Motion to Admit Jahan C. Sagafi Pro Hac Vice
- Proposed Order Admitting Jahan C. Sagafi Pro Hac Vice

were served by First Class U.S. Mail on the following:

Sam Shaulson
Debra Morway
MORGAN LEWIS & BOCKIUS, LLP
101 Park Avenue
New York, NY 10178



Dawn E. Behrmann